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11 *Attorney for Plaintiff, U.S. Bank National Association, As Successor In Interest To Wachovia*
12 *Bank, National Association, As Trustee For Banc Of America Funding Corporation Mortgage*
13 *Pass-Through Certificates, Series 2004-C*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 U.S. BANK NATIONAL ASSOCIATION,
12 AS SUCCESSOR IN INTEREST TO
13 WACHOVIA BANK, NATIONAL
14 ASSOCIATION, AS TRUSTEE FOR BANC
15 OF AMERICA FUNDING CORPORATION
16 MORTGAGE PASS-THROUGH
17 CERTIFICATES, SERIES 2004-C,

18 Plaintiff,

19 vs.

20 NORTH AMERICAN TITLE INSURANCE
21 COMPANY,

22 Defendant.

Case No.: 2:19-cv-00424-JAD-EJY

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE RESPONSES
TO MOTION FOR PARTIAL
SUMMARY JUDGMENT [ECF No. 49]
AND MOTION TO SEAL [ECF No. 46]**

(Second Request)

[ECF No. 62]

23 Plaintiff U.S. Bank National Association, As Successor In Interest To Wachovia Bank,
24 National Association, As Trustee For Banc Of America Funding Corporation Mortgage Pass-
25 Through Certificates, Series 2004-C (“Plaintiff”), and Defendant North American Title Insurance
26 Company (“Defendant”, collectively, the “Parties”), by and through their counsel of record,
27 hereby stipulate and agree as follows:

- 28 1. On April 6, 2023, Plaintiff filed a Motion for Partial Summary Judgment [ECF No. 38].
2. On April 27, 2023, Defendant filed its Opposition to Plaintiff’s Motion for Partial
Summary Judgment [ECF No. 49] (“Opposition”), as well as a Motion for Leave to File
its Opposition and Countermotion Under Seal [ECF No. 46] (“Motion for Leave”).

- 1 3. On May 2, 2023, Defendant filed its Countermotion for Partial Summary Judgment [ECF
- 2 No. 53] (“Countermotion”).
- 3 4. Plaintiff’s deadline to file its response to Defendant’s Opposition, Countermotion and
- 4 Motion for Leave is May 23, 2023 [ECF No. 61].
- 5 5. Plaintiff requests a brief extension until Friday, June 2, 2023 to file its responses to
- 6 Defendant’s Opposition, Countermotion and Motion for Leave. The extension is
- 7 requested to afford Plaintiff’s counsel additional time to review and respond to the
- 8 arguments in Defendant’s briefing as lead counsel for Plaintiff has been out-of-state in
- 9 trial.
- 10 6. Defendant also requests that its deadline to file its Response to Plaintiff’s Opposition to
- 11 Defendant’s Countermotion and its Response to Plaintiff’s Opposition to Defendant’s
- 12 Motion to Seal be set for June 23, 2023, to afford Defendant’s counsel sufficient time to
- 13 review and respond to the arguments raised in Plaintiff’s Oppositions.
- 14 7. Counsel for Plaintiff and counsel for Defendant do not oppose the requested extensions.

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1 8. This is the second request for these extensions which are made in good faith and not for
2 purposes of delay.

3 **IT IS SO STIPULATED.**

4 DATED this 22nd day of May, 2023.

DATED this 22nd day of May, 2023.

5 WRIGHT, FINLAY & ZAK, LLP

EARLY SULLIVAN WRIGHT GIZER &
McRAE LLP

6
7 /s/ Lindsay D. Dragon

/s/ Sophia S. Lau

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12 **IT IS SO ORDERED.**

13 Dated this 25th day of May, 2023.

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UNITED STATES DISTRICT COURT JUDGE